

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

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MYNETTE TECHNOLOGIES, INC. )  
and STEVEN M. COLBY, )  
Plaintiffs, ) Case No. 16-cv-01647-RTH  
v. ) Judge Ryan T. Holte  
THE UNITED STATES, )  
Defendant, )  
and )  
GEMALTO, INC. and IDEMIA IDENTITY )  
& SECURITY USA LLC, )  
Intervenor-Defendants. )  
)

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**JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT SUBMISSIONS**

WHEREAS, on December 5, 2022, the Court issued an Opinion and Order granting-in-part Defendants' Motion for Sanctions. (ECF No. 153)

WHEREAS, in the Opinion and Order, the Court ordered the parties to, *inter alia*, jointly (i) file a motion to vacate the Court's protective order (ECF No. 74) by December 19, 2022, (ii) file a stipulated amended protective order including a covenant not to sue consistent with the Opinion and Order by December 19, 2022, and (iii) file a joint status report proposing a timeline for further proceedings consistent with the Court's Opinion and Order by January 4, 2023.

WHEREAS, the Court has granted several joint requests for extensions of those dates, and the current deadlines are: the deadline for the Joint Motion to Vacate the Protective Order and

Stipulated Amended Protective Ordering containing a covenant not to sue is March 10, 2023; and the deadline for a joint status report proposing a timeline for further proceedings is March 17, 2023. *See* February 17, 2023 Court Order.

WHEREAS, the parties wish to advise the Court that they have continued to make further progress in the past week in their attempt to reach agreement on the covenant not to sue. Based on their progress made to date, the parties believe that an additional three-week extension is necessary to accomplishing that goal, and do not anticipate requiring further extensions.

WHEREAS, the parties jointly make this request because the parties are continuing to negotiate the proposed covenant and believe that more time would potentially allow the parties to reach agreement or otherwise narrow the issues. The parties appreciate the Court's indulgence in granting these requests, but they are all working diligently and in good faith to resolve remaining issues.

THEREFORE, Plaintiffs, the United States, and Third Party Defendants respectfully request that the Court grant their joint request for an enlargement of time. With this enlargement, the deadline for the Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Ordering containing a covenant not to sue will be March 31, 2023, and the deadline for a joint status report proposing a timeline for further proceedings will be April 7, 2023.

Respectfully submitted,

By: /s/

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March 10, 2023

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March 10, 2023

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March 10, 2023